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Attorneys for Plaintiffs
Parkridge and Mabel Mak

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

On Behalf of PARKRIDGE LIMITED, a Hong
Kong corporation, by Mabel Mak, and MABEL
MAK, an individual,

Plaintiffs,

v.

INDYZEN, INC., a California corporation, and
PRAVEEN NARRA KUMAR, an individual,
Defendants.

Case No. 16-cv-07387-KAW

**DECLARATION IN SUPPORT OF
MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANTS' MOTION
TO COMPEL ARBITRATION OF FIVE
NEWLY-NAMED PARTIES UNTIL
AFTER THE HOLIDAYS**

Date: December 19, 2017
Time: N/A
Dept.: N/A
Judge: Hon. Kandis A. Westmore

I, **ADAM WOLEK**, hereby declare as follows:

1. I have personal knowledge of all matter stated herein.
2. I am counsel for Plaintiffs Parkridge *et al.*

3. I requested an extension from Defendants' counsel via telephone conference and through email because the electronically-generated briefing schedule would require counsel to work over Christmas, among other reasons. *See* Exhibit A. Defendants' counsel agreed to a response date of at least January 4, 2018. *See id.* However, that due date would still interfere with the upcoming holidays and my and my associates' travels for the holidays because a Response being due *right after* the holidays would effectively require counsel to work *over* the holidays. I accordingly requested additional time to avoid interfering with the holidays. *See id.*

4. Furthermore, more than two weeks is needed to address all of the complex issues raised in Defendants' motion, including, among other issues, whether each of the five newly-named entities were signatories to an agreement premised on an alter-ego theory (each would have to undergo a separate alter-ego analysis), whether the Court properly has jurisdiction over *each* of the five newly-named entities, and whether *each* of the five newly-named entities Consents to Magistrate Judge Jurisdiction.

5. Moreover, given that the five newly-named parties are *all located in* Asia, the time difference and logistical communication issues further exacerbate delays in getting information, and sign off, to respond and address each of the relevant issues.

6. Because this matter is stayed before this Court, it would not have an impact on the case schedule.

7. For these, and other reasons, I respectfully request the Court enter an order extending the deadline from January 4, 2018, to respond to at least January 18, 2018.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 19, 2017

Respectfully submitted,

By: /s/ Adam Wolek